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November 13, 2020

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2020-3019369 and R-2020-3019371**

Dear Secretary Chiavetta:

Enclosed for filing is the **Stipulation between Pennsylvania-American Water Company and Commission on Economy Opportunity** (the “CEO Stipulation”), in the above-referenced matters. The CEO Stipulation was initially filed with the Commission on Tuesday, November 10, 2020 with the Main Brief of Respondent Pennsylvania-American Water Company in this proceeding.

We are re-submitting the CEO Stipulation as a separate filing under a revised cover letter and with a revised Certificate of Service at the Secretary’s Bureau’s request.

As evidenced by the enclosed Certificate of Service, copies of the CEO Stipulation have been served on Administrative Law Judge Conrad A. Johnson and all parties of record.

If you have any questions, please contact me directly at (215) 963-5384. Thank you.

Sincerely,



Kenneth M. Kulak

Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket No. R-2020-3019369
	:	Docket No. R-2020-3019371
	:	
v.	:	
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served copies of the **Stipulation between Pennsylvania-American Water Company and Commission on Economy Opportunity** in the above-referenced proceedings on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Counsel for
Pennsylvania-American Water Company

Dated: November 13, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
	:	
v.	:	DOCKET NOS. R-2020-3019369
	:	R-2020-3019371
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

STIPULATION

Pennsylvania-American Water Company (“PAWC” or the “Company”) and the Commission on Economic Opportunity (“CEO”) (together, the “Stipulating Parties”), by their respective counsel, hereby enter into this Stipulation to address issues raised by CEO in the above-referenced water and wastewater base rate proceeding. The Stipulating Parties request that Administrative Law Judge Conrad A. Johnson (the “ALJ”) and the Pennsylvania Public Utility Commission (the “Commission”) approve and adopt this Stipulation.

I. TERMS OF THE STIPULATION

A. COVID-19 Related Terms

1. PAWC will waive reconnection fees for customers at or below 200% of the Federal Poverty Level (“FPL”) for one year from the date of the final order in the above-referenced proceeding (the “Final Order”) and track the extraordinary, nonrecurring incremental COVID-19 related expense and shall maintain detailed accounting records of such expense
2. PAWC will waive the good faith payment requirement for PAWC’s H2O Help to Others Hardship Fund for one year from the date of the Final Order.

3. PAWC will permit customers to self-certify income for purposes of qualifying for the PAWC's H2O Help to Others Hardship Fund until the earlier of: (1) March 31, 2021; (2) the date on which the Governor's Proclamation of Disaster Emergency is rescinded.

4. PAWC will expand community outreach to communities in need within PAWC service territories. This includes developing a community outreach plan to target communities significantly impacted as a result of the COVID-19 emergency. Through the low-income advisory group, PAWC will seek input from interested parties and stakeholders to target areas with significant need. The community outreach plan will include an overall strategy and tactics to educate and enroll eligible and interested customers at or below 50% of the FPL.

5. The Company's annual contribution to its hardship grant program will be increased from its current level of \$400,000 to \$500,000 for water operations and from \$50,000 to \$100,000 for wastewater operations.

B. Low Income Programs

6. PAWC will delete "To remain eligible for this rate, such customer must continually make timely payments on the discounted bills" from its water and wastewater tariffs.

7. PAWC will enhance its training materials and call scripts to specifically address how customers who call PAWC and the Customer Service Center indicating that they are having trouble paying their bills or are seeking financial assistance are directed to PAWC's customer assistance programs.

8. PAWC will continue to promote charitable contributions and donations to its H2O Help to Others Hardship Fund and expand its outreach channels to include working with the low-income advisory group to identify new sources of funding for the Hardship Fund.

9. Within 90 days of a Commission Final Order in this proceeding, PAWC will establish a low-income advisory group to include community based organizations within the Company's service territory, representative from the Commission's Bureau of Consumer Services, interested stakeholders and interested parties in this case for the purpose of soliciting input to enhance the H2O Help to Others Program. The group will meet on a quarterly basis, with the first meeting of the advisory group to be held within 90 days of a Commission's Final Order in this proceeding.

10. PAWC will develop a process for program data collection and reporting to better count low income customers, regardless of how that information is provided.

PAWC will enhance its program data collection and reporting of its low income customers as follows:

- A. PAWC will note accounts in its Customer Information System (CIS) as low income when it receives income information indicating a customer is at or below 150% FPL, including but not limited to, requests for PAWC or Commission issued payment arrangements and applications for the H2O Help to Others Program.
- B. PAWC will begin tracking the following metrics:
 - The reasons that a H2O Help to Others bill discount program customer left the program;
 - Consistent monthly data related to low income arrearages by rate zone;
 - Consistent monthly data related to low income terminations by rate zone; and
 - Number of "Confirmed low-income customers" for whom PAWC has obtained income information either verbally or in writing, indicating that the customer is at or below 150% of the federal poverty level.
- C. PAWC will utilize the data in subsection A and B to analyze the level of accessibility and reasons for customers leaving the H2O Help to Others bill discount program. Results of this analysis should be shared with parties and stakeholders through the low income advisory group to evaluate ways to improve the accessibility of the H2O Help to Others bill discount program.

11. No later than six months after a final order in this proceeding, PAWC will present an Arrearage Management Plan (AMP) to the Commission for review and approval. The AMP will be designed through a multi-party stakeholder consultative process, with the Commission's Bureau of Consumer Services invited to participate as a stakeholder.

II. CONCLUSION

THEREFORE, the Stipulating Parties, by their respective counsel, hereby evidence their agreement to the terms of the Stipulation set forth above and request respectfully request that the Commission adopt the Stipulation in the Final Order in this case.



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Respectfully submitted,



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Dated: November 5, 2020